

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL)	
CORP., Plaintiff,)	
)	
v.)	
)	No. 1:17-mc-00151-LPS
BOLIVARIAN REPUBLIC OF)	
VENEZUELA,)	
Defendant.)	
)	

**EMERGENCY NOTICE OF CHANGED CIRCUMSTANCES AND
SUPPLEMENTAL REQUEST FOR LIMITED QSF RESERVE**

January 6, 2026

Dear Judge Stark:

Movant Leroy A. Garrett, pro se, respectfully notifies the Court of profound changed circumstances warranting immediate consideration of a limited Qualified Settlement Fund (QSF) reserve (D.I. 2561 and prior supplements).

On January 3, 2026, Nicolás Maduro Moros was captured by U.S. forces pursuant to the 2020 sealed superseding indictment in the Southern District of New York (S4 11 Cr. 205 (AKH)), charging him and co-conspirators with narco-terrorism, corruption of Venezuelan institutions, and using state power to facilitate cocaine trafficking into the United States over 25 years.

This indictment explicitly frames Maduro as the architect of a criminal enterprise that abused public office and corrupted once-legitimate institutions — including the 2002–2003 political purge of PDVSA workers, part of the same systematic repression to consolidate power.

The capture ends the regime responsible for the purge and eliminates retaliation risk against victims receiving reparations.

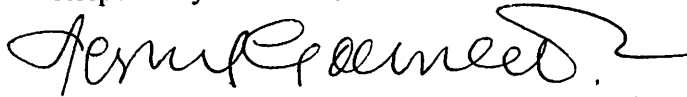


The PDVSA Ad Hoc board — a U.S.-government-licensed entity created to protect Venezuelan assets from the indicted narco-regime — can no longer justify opposing reparations. Continued obstruction now contravenes its mandate and betrays the Venezuelan people it was licensed to serve.

A modest QSF reserve (1–5% of proceeds) is the only equitable path to true clean title for the purchaser, eliminating successor-liability risk and aligning with U.S. policy following the regime's collapse.

Movant requests an immediate indicative ruling or status conference.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leroy A. Garrett", with a horizontal line drawn underneath it.

Dr. Leroy A. Garrett
Venezuelan Petroleum Holocaust
Pro Se Attorney
6725 S Fry Road Ste. 700-338. Katy Texas 77494

cc: All counsel of record (via ECF)
Enclosures: SDNY Indictment S4 11 Cr. 205 (AKH)